

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

YVONNE TINES JONES)	C. A. NO. 05-10082-EFH
Plaintiff)	
)	
Vs.)	
)	
NORMAN Y. MINETA,)	
SECRETARY, U. S. DEPARTMENT)	
OF TRANSPORTATION,)	
And)	
U. S. DEPARTMENT OF TRANSPORTATION)	
Defendants)	
)	

JOINT MOTION TO CONTINUE FINAL PRETRIAL CONFERENCE SIXTY DAYS

The parties to the above-captioned action, through counsel, hereby respectfully request that the Court continue the final pretrial conference in this action by sixty days, to allow the parties to complete discovery and explore the possibility of settlement. As grounds for this motion, the parties state as follows:

1. This is an action by a former federal employee alleging discrimination in employment.
2. A final pretrial conference is scheduled in this action for October 16, 2007.
3. The parties require an additional sixty days in which to complete discovery in this action.
4. Should the Court allow an additional sixty days prior to the final pretrial conference in this action, counsel will be able to determine whether this action is amenable to either settlement or mediation.

For all of the foregoing reasons, it is respectfully requested that this motion be granted, that the final pretrial conference in this action be continued for at least sixty days, and that the parties be allowed to engage in discovery until the date of the pretrial conference.

Respectfully submitted,

Plaintiff
By her attorney,
Mitchell J. Notis

/s/Mitchell J. Notis

Mitchell J. Notis
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, Massachusetts 02445
617-566-2700

Defendants,
By their attorneys,
Michael J. Sullivan
United States Attorney
Rayford A. Farquhar
Assistant United States Attorney

/s/Rayford A. Farquhar

Rayford A. Farquhar
Assistant United States Attorney
John Joseph Moakley Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
617-748-3282

CERTIFICATE OF SERVICE

I, Mitchell J. Notis, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to any non-registered participants as indicated in the Notice of Electronic Filing, this 5th day of October, 2006.

/s/Mitchell J. Notis

MITCHELL J. NOTIS, BBO# 374360
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
Tel: 617-566-2700

